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September 29, 2016

**VIA ECF**

The Honorable James Orenstein  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Amber Daniels, et al. v. City of New York, et al., 16-CV-190 (WFK) (JO)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to the above-referenced matter on behalf of defendants City of New York (“City”), Sergeant Alexandru Anghel, Detective James Baez, and Detective Jon Gladstone (collectively, “defendants”). I write to respectfully request that the Court grant defendants a one-week extension of time to comply with Your Honor’s September 15, 2016, Order that defendants disclose documents requested by plaintiffs by September 29, 2016. Plaintiffs’ counsel, Ryan Lozar, consents to this request. This is defendants’ first request for an enlargement of time to comply with Your Honor’s Order.

By way of background, plaintiffs allege, *inter alia*, that on July 17, 2014, they were falsely arrested after officers of the New York City Police Department (“NYPD”) entered their residence. Plaintiffs moved to compel: (1) photographic array records; (2) pre-recorded buy money records; (3) laboratory reports; and (4) various officers’ memo book entries concerning visits to Apt. 12B leading up to the search on July 17, 2014. After a status conference on September 15, 2016, Your Honor granted plaintiffs’ motion. Since then, defendants have obtained a substantial amount of responsive documents. However, defendants are still attempting to locate memo book entries for several officers and anticipate requiring an additional week to do so.

For the foregoing reasons, it is respectfully requested that the Court grant the within request to extend defendants’ time to comply with Your Honor’s September 15, 2016, Order that defendants disclose documents requested by plaintiffs to and including October 6, 2016.

Thank you for your consideration herein.

Respectfully submitted,

/s/

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